

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION

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STEVEN DUNCAN, et al., Individually and  
on Behalf of All Others Similarly Situated,

Plaintiffs,

Civil No. 2:16-cv-01229-PP

vs.

CLASS ACTION

JOY GLOBAL INC., et al.,

Defendants.

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NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT, APPROVAL OF PLAN OF ALLOCATION, AND AWARD OF  
ATTORNEYS' FEES

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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiffs and Lead Counsel will move this Court, before the Honorable Pamela Pepper, United States District Judge for the Eastern District of Wisconsin, at the United States Courthouse and Federal Building, 517 E. Wisconsin Ave., Room 222, Milwaukee, Wisconsin, on December 20, 2018, at 2:00 p.m., for entry of orders, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (a) finally approving the proposed class action settlement on the terms set forth in the Stipulation of Settlement, dated May 22, 2018 ("Stipulation"); (b) approving the Plan of Allocation of settlement proceeds; and (c) awarding Lead Counsel's attorneys' fees.

This motion is based on: (i) the Memorandum in Support of Motion for Final Approval of Class Action Settlement, Approval of Plan of Allocation, and Award of Attorneys' Fees; (ii) the Declaration of David A. Knotts in Support of Motion for Final Approval of Class Action Settlement, Approval of Plan of Allocation, and Award of Attorneys' Fees; (iii) the Declarations of Lead Plaintiffs; (iv) the Declaration of Carole K. Sylvester; (v) the Declarations of Plaintiffs' Counsel; (vi) the Stipulation; and (vii) all other proceedings herein.

Proposed orders will be submitted with Lead Plaintiffs' and Lead Counsel's reply submission on or before December 13, 2018.

DATED: November 15, 2018

Respectfully submitted,

ROBBINS GELLER RUDMAN  
& DOWD LLP  
RANDALL J. BARON  
DAVID T. WISSBROECKER  
DAVID A. KNOTTS

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*s/ David A. Knotts*  
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CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 15, 2018.

s/ David A. Knotts

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# Mailing Information for a Case 2:16-cv-01229-PP Duncan v. Joy Global Inc et al

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## Manual Notice List

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